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4 IN THE UNITED STATES DISTRICT COURT
5 FOR THE NORTHERN DISTRICT OF CALIFORNIA
6 SAN FRANCISCO DIVISION
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9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 CHRISTOPHER WAGNER,

13 Defendant.
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Case No.: 3:21-MJ-71960

**STIPULATION AND [PROPOSED]
ORDER MODIFYING CONDITIONS OF
RELEASE**

1 For the reasons discussed at the last court appearance in the above-captioned matter, the
2 parties, with the concurrence of the Pretrial Services Officer, agree and jointly stipulate that the
3 conditions of pretrial release for Defendant Christopher Wagner be amended as follows
4 regarding his employment obligations:

- 5 1. The defendant may take possession of the ioSafe storage device, (USB backup drive)
6 returned by FBI agents to restore necessary business and tax data on his software
7 monitored, desktop computer. This should occur in coordination with Pretrial
8 Services and he may maintain the USB backup drive for no more than 48 hours. The
9 USB drive should then be removed from his possession.
- 10 2. The defendant may take possession of the laptop computer returned by FBI agents at
11 the time of his monitoring software installation appointment on the morning of April
12 12, 2022. Thereafter, and in coordination with Pretrial Services, he may conduct a
13 direct transfer of data from the desktop computer by plugging it into to the laptop
14 computer that same day. Once completed, the defendant will remove the desktop
15 computer from his residence and have only the laptop computer in his possession
16 which he may also utilize to satisfy his employment requirements.
- 17 3. The defendant may only utilize USB storage devices for employment purposes and at
18 customer's locations. USB devices needed for customer's will be ordered and shipped
19 directly to their locations and left at their locations thereafter.

20 IT IS SO STIPULATED.

21 April 7, 2022
22 Dated

STEPHANIE HINDS
Acting United States Attorney
Northern District of California

23
24 /S
25 _____
KENNETH CHAMBERS
Assistant United States Attorney
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April 7, 2022
Dated

JODI LINKER
Federal Public Defender
Northern District of California

/S

DANIEL P. BLANK
Assistant Federal Public Defender

IT IS SO ORDERED.

Dated

JOSEPH C. SPERO
United States Magistrate Judge